

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of

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MUR 3774

RESPONSE TO SUBPOENA TO
MDS COMMUNICATIONS CORP.

Comes now MDS Communications Corp., by Ned Elliott, and, in response to the subpoena by the Federal Election Commission, alleges and says:

REQUEST FOR PRODUCTION OF DOCUMENTS

All documents relating to work performed, or services rendered, by MDS Communications Corp., or by any subcontractor of MDS Communications Corp., for the National Right to Life Committee, between October 1, 1994 and January 1, 1995. Such documents shall include, but are not limited to, contracts, invoices, purchase orders, letters, memos, notes, facsimile transmissions, electronic mail transmissions and checks.

RESPONSE: See attached Exhibits B, C and D.

REQUEST FOR ANSWERS TO QUESTIONS

1. Identify all current and former officers, employees and consultants of MDS Communications Corp., with knowledge of work performed, or services rendered, by MDS Communications Corp., for the National Right to Life Committee ("NRLC") between October 1, 1994 and December 31, 1994.

RESPONSE:

Current and Former Officers

Jonathan D. Mount, Jr. - President/Treasurer
558 S. Pueblo, Gilbert, AZ 85234 (602)892-7883

Laura K. Mount - Secretary
558 S. Pueblo, Gilbert, AZ 85234 (602)892-7883

Current and Former Employees

See attached Exhibit A.

2. Identify any and all subcontractors of MDS Communications Corp. who conducted telemarketing programs for the NRLC between October 1, 1994 and December 31, 1994.

RESPONSE: MDS Communications Corp. did not utilize the services of any consultants respecting NRLC programs during this time.

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3. Identify the owner(s) of all lists used by MDS Communications Corp., or any of its subcontractor(s) in telemarketing programs conducted for the NRLC between October 1, 1994 and December 31, 1994. For those lists not provided directly by the list's owner, identify the source providing the list.

RESPONSE: To the best of our knowledge, for NRLC programs conducted within this time frame, all lists were provided to MDS by NRLC.

4. For each telemarketing program conducted by MDS Communications Corp. or any subcontractor(s) for the NRLC between October 1, 1994 and December 31, 1994, provide the dates of such program(s), the total number of phone calls made, the state(s) in which phone calls were made, and the total cost of the program.

RESPONSE: MDS Communications Corp. conducted no telemarketing campaigns for NRLC during this time frame. MDS Communications Corp. did conduct three (3) Get-Out-The-Vote telemarketing campaigns for the NRL Political Action Committee during this time frame. Details of these campaigns are:

<u>CAMPAIGN</u>	<u>CALL DATES</u>	<u># OF CALLS</u>	<u>STATES CALLED INTO</u>	<u>TOTAL BILLED</u>
AZCD1	Nov. 4-7, 1994	5,872	Arizona	\$2,499.20
AZCD6	Nov. 4-7, 1994	4,265	Arizona	\$1,696.00
PaSen	Nov. 4-7, 1994	20,729	Pennsylvania	\$8,243.20

5. State whether Denise Neary is currently an employee or consultant of MDS Communications Corp. If so, state when she began working for MDS and provide her current position, business address and telephone number.

RESPONSE: Denise Neary is currently an employee of MDS Communications Corp. Her date of hire was June 19, 1996. Her current position is Account Executive. She works out of her home, located at [REDACTED] Her phone number is [REDACTED]

6. For each question above, identify the person(s) who has the most knowledge with respect to your answer.

RESPONSE:

#1 - (Officers) - Jonathan Mount - President
(Employees) - Angela Hicks - MDS Human Resource Manager
#2 - Edwards Elliott - NRLC Account Manager
#3 - Edwards Elliott - NRLC Account Manager
#4 - Edwards Elliott - NRLC Account Manager
Torin Campbell - Controller

#5 - Angela Hicks - MDS Human Resources Manager

I, Ned Elliott, being duly sworn, make the statements contained herein on behalf of MDS Communications Corp. to the best of my personal knowledge, information and belief, under penalty of perjury.

Ned Elliott

_____, 1997

STATE OF ARIZONA)

COUNTY OF _____)

Before me, a Notary Public in and for said State and County, personally appeared Ned Elliott, and acknowledged the execution of the foregoing instrument and made oath that the information provided therein was made to the best of his personal knowledge, information and belief, and, where based on information and belief, he believes the information to be true.

Witness my hand and notarial seal this _____ day of

_____, 1997.

Notary Public

My Commission Expires:

_____, 19 ____.



DESCRIPTION OF EXHIBITS

Supplied to the F.E.C. in response to subpoena

EXHIBIT A

This is an Excel spreadsheet detailing a list of all persons employed by MDS Communications Corp. in the pay period of November 10, 1994, the only pay period in which there was any call activity for National Right to Life or its subsidiaries. This information was gathered from multiple sources, including obsolete databases and personnel records. This is in hard copy and on disk.

EXHIBIT B

These are the contracts and addenda in force for the time period in question. They include separate contracts and addenda for donor and prospect programs. These contracts don't explicitly cover Get-Out-The-Vote programs, but we ran these programs with verbal understandings with our client. This is in hard copy and on disk.

EXHIBIT C

This contains all existing copies of the call dialer printouts for the three Get-Out-The-Vote programs conducted for National Right to Life Political Action Committee for the time frame in question. The front two pages are copies of the reports sent to the client on Monday November 7, 1994 and Tuesday November 8, 1994. These printouts and reports no longer exist on computer.

EXHIBIT D

This contains the invoices that MDS Communications Corp. prepared and sent to the National Right to Life Political Action Committee requesting payment for services rendered for the three Get-Out-The-Vote programs conducted in November 1994. This is in hard copy and on disk.

NOTE:

Despite extensive searches through files, disks, and computer hard drives, we have been unable to find any copies of the scripts used for these campaigns, or any copies of checks sent to MDS as payment for the invoices detailed. The records being sent are the sum total of all data we have been able to find relating to these campaigns.

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RESPONSE: See attached Exhibits B, C and D.

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Laura K. Mount - Secretary
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Current and Former Employees

See attached Exhibit A.

2. Identify any and all subcontractors of MDS Communications Corp. who conducted telemarketing programs for the NRLC between October 1, 1994 and December 31, 1994.

RESPONSE: MDS Communications Corp. did not utilize the services of any consultants respecting NRLC programs during this time.

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3. Identify the owner(s) of all lists used by MDS Communications Corp., or any of its subcontractor(s) in telemarketing programs conducted for the NRLC between October 1, 1994 and December 31, 1994. For those lists not provided directly by the list's owner, identify the source providing the list.

RESPONSE: To the best of our knowledge, for NRLC programs conducted within this time frame, all lists were provided to MDS by NRLC.

4. For each telemarketing program conducted by MDS Communications Corp. or any subcontractor(s) for the NRLC between October 1, 1994 and December 31, 1994, provide the dates of such program(s), the total number of phone calls made, the state(s) in which phone calls were made, and the total cost of the program.

RESPONSE: MDS Communications Corp. conducted no telemarketing campaigns for NRLC during this time frame. MDS Communications Corp. did conduct three (3) Get-Out-The-Vote telemarketing campaigns for the NRL Political Action Committee during this time frame. Details of these campaigns are:

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RESPONSE: Denise Neary is currently an employee of MDS Communications Corp. Her date of hire was June 19, 1996. Her current position is Account Executive. She works out of her home, located at 217 Maple Avenue, Clarks Summit, PA 18411. Her phone number is (717) 587-3588.

6. For each question above, identify the person(s) who has the most knowledge with respect to your answer.

RESPONSE:

#1 - (Officers)	- Jonathan Mount - President
(Employees)	- Angela Hicks - MDS Human Resource Manager
#2 - Edwards Elliott	- NRLC Account Manager
#3 - Edwards Elliott	- NRLC Account Manager
#4 - Edwards Elliott	- NRLC Account Manager
Torin Campbell	- Controller

#5 - Angela Hicks - MDS Human Resources Manager

EDWARDS E. ELLIOTT

I, ~~Ned~~ Elliott, being duly sworn, make the statements contained herein on behalf of MDS Communications Corp. to the best of my personal knowledge, information and belief, under penalty of perjury.

Edwards E. Elliott

EDWARDS E. ~~Ned~~ Elliott

EDWARDS E.

September 24

, 1997

STATE OF ARIZONA)

COUNTY OF MARICOPA)

EDWARDS E.

Before me, a Notary Public in and for said State and County, personally appeared ~~Ned~~ Elliott, and acknowledged the execution of the foregoing instrument and made oath that the information provided therein was made to the best of his personal knowledge, information and belief, and, where based on information and belief, he believes the information to be true.

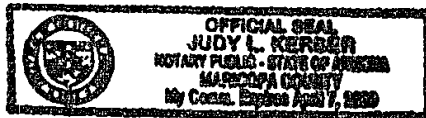
Witness my hand and notarial seal this 24th day of

September, 1997.

Judy L. Kerber

Notary Public

My Commission Expires:



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